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UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE

In re

FREDRICK LOUIS HURT

Debtor

Case No: 13-33943 PJD

Chapter: 13

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MOTION TO AMEND PLAN BY PYRAMID FINANCIAL, INC.

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Comes now your movant, Pyramid Financial, Inc., and moves the Court to amend the debtor's Chapter 13 plan. The debtor filed this petition on December 31, 2013. The debtor purchased a 2001 Toyota Camry post-petition on April 11, 2014. The debtor left the vehicle at the police impound lot. Said creditor should be added to the plan on this post-petition debt for their claim to be filed in the amount of \$6,450.91, including a \$200.00 attorney fee, to receive ten percent interest per annum on the unpaid balance, with a monthly installment payment to be set by the Trustee sufficient to pay off the claim within the remaining life of the plan.

In the alternative, said creditor should be allowed to proceed with their State Court remedies.

WHEREFORE, PREMISES CONSIDERED, said creditor moves the Court to amend the debtor's Chapter 13 plan as set forth above.

STONE, HIGGS & DREXLER

By: /s/ David E. Drexler  
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tms/15-02901-0

**CERTIFICATE OF SERVICE**

**The following individuals were served August 13, 2015:**

**Debtor via U S Mail**

**Debtor's Attorney via E-mail**

**Trustee Via E-Mail**

/s/ David E. Drexler